

Law Office of Meredith S. Heller PLLC
www.mshellerlaw.com

99 Park Avenue, Penthouse Suite
New York, NY 10016
Phone: (646) 661-1808
Fax: (646) 661-1746
msheller@mshellerlaw.com

Of Counsel
Susan Thorn, Esq.
sthorn@mshellerlaw.com

February 4, 2022

VIA ECF

Honorable Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: *United States v. Mircea Constantinescu, et al.*
19-cr-651 (LPS) (SHS)

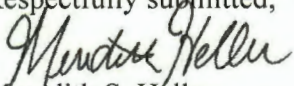
Dear Judge Swain:

This letter is submitted on behalf of my client, Mr. Mircea Constantinescu. It is respectfully requested that the conditions of his pretrial release be modified to remove the curfew and to permit his travel for work within the United States with only prior approval by Pretrial Services. Mr. Constantinescu's would maintain GPS location monitoring.

This request is necessary because Mr. Constantinescu's employment as a truck driver has been severely hampered by his inability to accept night shifts or delivery jobs outside the Southern and Eastern Districts of New York and the District of New Jersey. Mr. Constantinescu has been in compliance with the terms of his pretrial supervision. All charges relating to the April 2021 incident were dropped.

Both the government and Pretrial Services have been informed of this request. Pretrial Services, through P.T.S. Officer Courtney DeFeo, does not oppose this request. The Government, through A.U.S.A. Elizabeth Hanft, opposes the complete removal of a curfew but does not oppose lifting the travel restrictions, provided that Pretrial is informed of and verifies any work travel in advance.

Respectfully submitted,


Meredith S. Heller

Cc: A.U.S.A. Robert B. Sobelman (via ECF)
A.U.S.A. Elizabeth A. Hanft (via ECF)
A.U.S.A. Samuel P. Rothschild (via ECF)
P.T.S.O. Courtney M. DeFeo (via email)

2/11/2022
So Ordered.
S. J. W. Steen
U.S.D.S.